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December 19, 2018

District Judge Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Johnson v. 7-Eleven, Inc.  
1:18-cv-05351-NGG-LB

Dear District Judge Garaufis:

This office represents the plaintiff in the above action and makes the present request for an extension of time to complete service pursuant to Fed. R. Civ. P. 4(m) and your Honor's Individual Rules, II(E).

The original date by which service is to be completed is Monday, December 24, 2018. Fed. R. Civ. P. 6(a)(1)(A)-(B) (excluding the date triggering the period and counting intermediate weekends).

The number of previous requests for adjournment or extension is zero. Since there have been no previous requests, whether any such requests were granted or denied is not applicable.

The adversary has not consented to this request because service has not been completed. The adjournment or extension does not affect any other scheduled dates.

Plaintiff has not received a response from defendant to the waiver of service. Plaintiff mailed "a copy of the complaint, 2 copies of the waiver form appended to this Rule 4, and a prepaid means for returning the form" on December 5, 2018. Fed. R. Civ. P. 4(d)(1). The waiver was mailed to defendant's registered agents in its incorporation state, Corporation Creations Network, 2425 West Loop S, Ste 200, Houston, TX 77027.

While plaintiff could arrange for personal service to the registered agent in Houston as early as tomorrow, plaintiff prefers to proceed via waiver because this affords the parties an orderly proceeding without having to request subsequent extensions from the Court. Plaintiff requests sixty (60) days to complete service, until Monday, February 18, 2019. Thank you.

Respectfully submitted,

/s/ Spencer Sheehan  
Spencer Sheehan

Certificate of Service

I certify that on December 19, 2018, I served the foregoing by electronically filing and/or mailing (first-class mail) same, to the persons or entities indicated below, at their last known address of record (blank where not applicable).

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☐ CM/ECF

☐ First-Class Mail

/s/ Spencer Sheehan  
Spencer Sheehan